

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

AFTER II MOVIE, LLC, ET AL.,

Plaintiffs,

v.

GRANDE COMMUNICATIONS
NETWORKS, LLC,

Defendant.

No. 1:21-cv-00709-RP

**DEFENDANT GRANDE COMMUNICATIONS NETWORKS, LLC'S RESPONSE TO
PLAINTIFFS' MOTION FOR 60 DAY EXTENSION OF TIME**

Defendant believes the parties should be able to resolve these types of matters informally. Defendant attempted to do so and was surprised that Plaintiffs filed the instant Motion. By email, Plaintiffs asked for a 60-day extension of time to respond to Defendant's interrogatories and requests for production, and Defendant responded as follows:

Grande agrees to a 30-day extension of both deadlines, and to your suggestion that the parties allow for an additional 3 days for service. By our calculation, this would bring both deadlines to April 28, 2022. If you believe plaintiffs require additional time as we approach mid/late April, we can discuss an additional extension at that time.

See Ex. 1. Plaintiffs then filed their Motion without further discussion, which appears to violate Local Rule CV-7(g). *See, e.g., Navarette v. C.R. Bard, Inc.*, No. 5:19-cv-01278-OLG, 2020 WL 8092373, at *2 (W.D. Tex. Oct. 2, 2020) (email was insufficient attempt to meet and confer).

Defendant's position remains the same. Defendant has agreed to extend Plaintiffs' deadline to April 28, 2022 (a 33-day extension), and if it appears that Plaintiffs will be unable to meet that deadline, they can request a second extension. Defendant will not unreasonably withhold consent. Defendant regrets that this matter has required the Court's attention.

Dated: March 14, 2021

Respectfully submitted,

By: /s/ Zachary C. Howenstine

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CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2021, I caused a copy of the foregoing to be served upon all counsel of record via ECF notification.

By: /s/ Zachary C. Howenstine